



United States Attorney
Southern District of New York

The Jacob K. Javitz Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

January 15, 2025

BY ECF

The Honorable Colleen McMahon
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Rafat Amirov and Polad Omarov, S8 22 Cr. 438 (CM)

Dear Judge McMahon:

The Government respectfully writes in advance of the conference scheduled for January 16, 2025 at 2:00 p.m. The parties have consulted and jointly propose the following schedule for pre-trial filings, in connection with the trial scheduled to begin March 10, 2025:

- expert disclosures due January 24, 2025;
- notice by the defendant(s) pursuant to Section 5 of the Classified Information Procedures Act (“CIPA”), if any, due January 24, 2025;¹
- opening motions *in limine*, requests to charge, and *voir dire*, due February 7, 2025, with oppositions due February 21, 2025, and replies, if any, due February 26, 2025.

The parties also respectfully request that the Court schedule a final pre-trial conference at a time convenient for the Court the week of March 3, 2025.

¹ Should either defendant make Section 5 notice, the Government will propose a schedule for possible motion practice pursuant to CIPA Sections 6(a) and 6(c).

In addition to the schedule set forth above, the parties have discussed the timeline for the Government's production of § 3500 material. The parties have agreed to the entry of the attached stipulated protective order governing § 3500 material, including those designated as attorney's eyes only. The proposed order is appended hereto as Exhibit A. The Government expects to make an initial production of § 3500 material by February 18, 2025, which is appropriately three weeks before trial. The defense has requested that the Government produce § 3500 material by February 14, 2025. The Government has advised that it will make efforts to do so, but that the timing of its production will be dependent, in part, on resources it may need to dedicate to witness preparation. In an effort to make efficient use of the Court's and the jury's time, the parties are continuing to discuss possible stipulations, including relating to custodians of electronic service providers, extractions of electronic devices, and translations.

Respectfully submitted,

EDWARD Y. KIM
Acting United States Attorney

By: _____ /s/
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cc: Defense Counsel (by ECF)